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UNITED STATES BANKRUPTCY COURT
 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re
 PG&E Corporation,
 and
 PACIFIC GAS AND ELECTRIC
 COMPANY,
 Debtors.

☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

*All papers shall be filed in the Lead Case,
 No. 19-30088-DM,

Case No. 19-30088-DM

Chapter 11
 Lead Case, Jointly Administered

**DECLARATION OF RICHARD
 FRANKEL IN SUPPORT OF MOTION
 PURSUANT TO FED. R. BANKR. PROC.
 7015 FOR AN ORDER DEEMING
 AMENDED CLAIM TO RELATE
 BACK/OR PURSUANT TO FED. R.
 BANKR. P. 9006(b)(1) TO ENLARGE THE
 TIME FOR JOSE AND KAREN MATA
 TO FILE PROOF OF CLAIM**

Date: August 4, 2020
 Time: 10:00 a.m.
 Crtrm.: Courtroom 17
 450 Golden Gate Avenue
 San Francisco, CA 94102
 Judge: Hon. Dennis Montali

Objection deadline: July 28, 2020
 4:00 p.m. (Pacific Time)

I, Richard Frankel, hereby declare as follows:

1. I am an attorney at law duly licensed to practice before the courts of the State of Texas, and in numerous federal courts. I am a lawyer with Reiner, Slaughter & Frankel, LLP, based in Redding, California.

2. My law firm represents wildfire victims who sustained losses from the Camp Fire in 2018. My firm has timely filed over 800 Proof of Claim forms with Prime Clerk for losses

1 clients have suffered as a result of these fires.

2 3. Jose and Karen Mata filed proofs of claim on October 17, 2019, well before the Bar
3 Claim Deadline of December 31, 2019.

4 4. On or about February 18, 2020, I became aware that the Matas had three children
5 who they could include in their proofs of claim. Within a week, on February 26, 2020, week o, I
6 the Matas' amended proofs of claim simply to include their three minor children.

7 5. I am over eighteen years of age, of sound mind, and fully-competent to make this
8 declaration. All statements in this declaration are based on my own personal knowledge and
9 observation and from my review of the court and business records in this case, or upon
10 information and belief as indicated. If called to testify on this matter, I can and would competently
11 testify to the matters set forth in this Declaration.

12 I declare under penalty of perjury pursuant to the laws of the United States of America that
13 the foregoing is true and correct.

14 Executed this 13th day of July, 2020, in Houston, Texas.

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16 By: 

17 RICHARD FRANKEL
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